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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF LAURA L. GOODMAN
IN SUPPORT OF REORGANIZED
DEBTORS' OPPOSITION TO MOTION FOR
RELIEF FROM PLAN INJUNCTION, TO
COMPEL ARBITRATION AND/OR FOR
ABSTENTION**

[Relates to Docket Nos. 11066, 11263]

Date: September 29, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Tele/Videoconference Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Laura L. Goodman, pursuant to section 1746 of title 28 of the United States Code, hereby
2 declare under penalty of perjury that the following is true and correct to the best of my knowledge,
3 information, and belief:

4 1. I am an attorney at law licensed to practice in the State of California and admitted to the
5 bar of this Court. I am an attorney with Gough & Hancock LLP, counsel for PG&E Corporation and
6 Pacific Gas and Electric Company, as debtors and reorganized debtors in the above-captioned chapter
7 11 cases. Unless stated otherwise, I have personal knowledge of the matters set forth herein. I submit
8 this Declaration in support of the *Reorganized Debtors' Opposition to Motion for Relief from Plan*
9 *Injunction, to Compel Arbitration and/or for Abstention* [Docket No. 11263] (the "**Opposition**").¹

10 2. Attached for the Court's convenience as **Exhibit A** is a true and correct copy of the Proof
11 of Claim filed by Tuscan Ridge Associates with Attachments 1-3.

12 3. Attached as **Exhibit B** is a true and correct copy of the November 20, 2018 Letter
13 Agreement between Tuscan Ridge Associates, LLC and Pacific Gas & Electric Company as attached to
14 the Proof of Claim.

15 4. Attached hereto as **Exhibit C** is a true and correct filed-stamped copy of a March 5, 2020
16 verified Complaint for Breach of Contract, For Breach of the Implied Covenant of Good Faith and Fair
17 Dealing; Petition to Compel filed by Tuscan Ridge Associates, Inc. against ECC Constructors, LLC that
18 I retrieved from the Butte County Superior Court online portal. The verification is signed by Scott Bates
19 as Managing Member for Tuscan Ridge Associates, Inc.

20 5. Attached hereto as **Exhibit D** is a true and correct filed-stamped copy of a March 9, 2020
21 Errata to Complaint filed by Tuscan Ridge Associates Inc. against ECC Constructors, LLC with Exhibits
22 A-D that I retrieved from the Butte County Superior Court online portal. The highlighting appearing on
23 Exhibit C to the document is contained in the copy that I downloaded from the Butte County Superior
24 Court online portal and not my own.

27 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
28 the Opposition.

6. Attached hereto as **Exhibit E** is a true and correct filed-stamped copy of a March 11, 2020 Declaration of Scott Bates in Support of Ex Parte Application for Writ of Attachment that I retrieved from the Butte County Superior Court online portal. The highlighting contained on the last page of the document is contained in the copy that I downloaded from the Butte County Superior Court online portal and not my own.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury and in accordance with laws of the United States of America that the foregoing is true and correct. Executed this fifteenth day of September, 2021, in San Francisco, California.

/s/ Laura L. Goodman
Laura L. Goodman